

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

KORYEO INTERNATIONAL CORP.

Plaintiff,

v.

TAE HEE KIM, MARTIN LEE, and SUN BOK
LEE,

Defendants.

Docket No.:

**ORDER TO SHOW CAUSE
FOR A TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

ORAL ARGUMENT REQUESTED

THIS MATTER having been brought before the Court by Plaintiff Koryeo International Corp. (collectively, “Plaintiff”), through its counsel, Milman Labuda Law Group PLLC, by way of Order to Show Cause seeking a temporary restraining order (“TRO”) and preliminary injunction pursuant to Federal Rule of Civil Procedure 65 and L. Civ. R. 65.1, and upon the Verified Complaint, Declarations and supporting exhibits, and Memorandum of Law submitted herewith, and the court having determined that good and sufficient reasons exist to proceed by way of Order to Show Cause, and for good cause shown,

IT IS on this ____ day of _____, 2020, ORDERED that Defendants Tae Hee Kim, Martin Lee and Shun Lee (collectively, “Defendants”) appear and show cause before United States District Court for the District of New Jersey, Hon. _____, at the Martin Luther King Building and United States Courthouse, located at 50 Walnut Street, Newark, New Jersey 07101, at _____ o’clock, or as soon thereafter as counsel can be heard, why a preliminary and permanent injunction should not be issued:

- (A) Enjoining and restraining Defendants from utilizing any of Plaintiff’s confidential and proprietary information;

- (B) Enjoining and restraining Defendants from soliciting any of Plaintiff's customers to cease purchasing products from Plaintiff and/or purchase products from any company other than Plaintiff;
- (C) Ordering Defendants to return all of Plaintiff's confidential and proprietary information in their possession, custody or control and destroy any copies of such information.
- (D) For such other relief as the Court shall deem just and equitable; and it is further

IT IS FURTHER ORDERED that:

1. Pending the return date on the Order to Show Cause and until further Order of this Court, Defendants shall be hereby temporarily enjoined and restrained from utilizing any of Plaintiff's confidential and proprietary information;
2. Pending the return date on the Order to Show Cause and until further Order of this Court, Defendants shall be hereby temporarily enjoined and restrained soliciting Plaintiff's customers to cease purchasing products from Plaintiff and/or purchase products from any company other than Plaintiff;
3. Pending the return date on the Order to Show Cause and until further Order of this Court, Defendants shall return all of Plaintiff's confidential and proprietary information in their possession, custody or control and destroy any copies of such information; and
4. Pending the return date on the Order to Show Cause and until further Order of this Court, Defendants shall immediately cease any other activities which impair or damage Plaintiff's goodwill, reputation, and/or business operations.

IT IS FURTHER ORDERED, that Defendants shall file with this Court and serve upon Plaintiff, within _____ days after service upon Defendants of this Order, a report in writing and under oath setting forth in detail the manner and form in which the Defendants have complied with the temporary restraints set forth herein; and,

IT IS FURTHER ORDERED, that the Defendants may move to dissolve or modify the temporary restraints herein contained on two (2) days' notice to Plaintiff's counsel, Milman Labuda Law Group PLLC, 3000 Marcus Ave., Suite 3W8, Lake Success, NY 11042.

IT IS FURTHER ORDERED, that Defendants shall serve and file their Answer to the Verified Complaint upon attorneys for Plaintiff within twenty (20) days from the date of service of the Verified Complaint and that if Defendants fail to so file and serve their Answer, judgment by default will be rendered against them for the relief demanded in the Verified Complaint; and

IT IS FURTHER ORDERED, that if Defendants do not file and serve opposition to the Order to Show Cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that Plaintiff files a proof of service and a proposed form of Order at least three (3) days prior to the return date.

IT IS FURTHER ORDERED, that the Court will notify the parties whether it will entertain argument on the return date of the Order to Show Cause in accordance with Local Civil Rule 78.1

United States District Judge